

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

TAMEKA YOUNG,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:23-cv-01244
)	
SENTRY SECURITY AGENCY, INC.,)	
)	
Defendant.)	
)	

JOINT PROPOSED SCHEDULING PLAN

Plaintiff and Defendant hereby propose the following Scheduling Plan.

1. The parties agree Track 2 is appropriate.
2. All motions for joinder of additional parties or amendment of pleadings shall be filed no later than **January 30, 2024**.
3. Discovery is not expected to be conducted in phases or limited to certain issues. Disclosure shall proceed in the following manner:
 - (a) The parties shall make all disclosures required by Rule 26(a)(1), Fed. R. Civ. P., no later than **January 30, 2024**.
 - (b) Plaintiff shall disclose all expert witnesses and shall provide the reports required by Rule 26(a)(2), Fed. R. Civ. P., no later than **March 28, 2024**, and shall make expert witnesses available for depositions, and have depositions completed, no later than **May 27, 2024**.
 - (c) Defendant shall disclose all expert witnesses and shall provide the reports required by Rule 26(a)(2), Fed. R. Civ. P., no later than **July**

15, 2024, and shall make expert witnesses available for depositions, and have depositions completed, no later than **August 26, 2024**.

(d) The parties agree that the presumptive limits of ten (10) depositions per side as set forth in Rule 30(a)(2)(A) shall apply. The parties request up to Thirty-Five (35) interrogatories per party insofar as this is a wrongful death claim with three beneficiaries under R.S.Mo. §537.080.

(e) The parties agree that there will be no need for requests for physical or mental examinations of parties pursuant to Rule 35, Fed. R. Civ. P.

(f) The parties shall complete all discovery in this case no later than **August 26, 2024**.

4. The parties do not anticipate there will be any issues with respect to electronically stored information.

5. The parties do not anticipate filing any materials under seal.

6. Any motions to dismiss, for summary judgment, motions for judgment on the pleadings or, if applicable, any motion to exclude testimony pursuant to Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579 (1993) or Kumho Tire Co. Ltd v. Carmichael, 526 U.S. 137 (1999), must be filed no later than **August 12, 2024**. Any response shall be filed no later than **September 13, 2024**. Any reply shall be filed no later than **October 1, 2024**. In the event dispositive motions are filed prior to the above specified date, the opposing party shall file a response thirty (30) days after the filing of the dispositive motion. A reply may be filed ten (10) days after the filing of the response. Briefing of such motions shall be governed by E.D. Mo. L. R. 4.01.

7. The case will be tried to a jury. The parties expect that trial will take **3** days to complete. The parties request a trial date in or after _____.

BRUNTRAGER & BILLINGS, P.C.

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of December, 2023, the foregoing **Joint Proposed Scheduling Plan** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Charles W. Billings